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June 24, 2025

VIA ECF

Hon. Ronnie Abrams, U.S.D.J.
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: ***Rugova v. Silverstone Property Group LLC et al.***
23-cv-02648-RA-RWL

Dear Judge Abrams:

This firm represents Defendants Silverstone Property Group, LLC (“Silverstone”) and Madison Realty Capital, L.P. (“Madison”) (collectively, “Defendants”). Pursuant to Paragraph 1(D) of Your Honor’s *Individual Rules & Practices in Civil Cases*, Defendants write to respectfully request an extension of the current summary judgment briefing schedule. *See* ECF Doc. 65.

As indicated in the Defendants’ prior letter, the Defendants have been evaluating the impact of the change in law concerning the frequency of pay provisions of New York Labor Law 198, which were recently enacted by the legislature. The Defendants have also been working on their summary judgment motion, but days after the Court granted the last extension, I became ill and am still on prescription medication, which is the reason for this letter and requested extension. Although the details of the undersigned’s illness have been left off the public docket for privacy concerns, the undersigned writes to request a short extension of time to recover and finish preparing Defendants’ motion papers with sufficient time for the Defendants to participate in the final review of the motion prior to its filing.

The Defendants request that the Court adjust the Parties’ briefing schedule as follows:

- Moving papers: From June 30, 2025, to July 14, 2025
- Opposition papers: From July 28, 2025, to August 11, 2025
- Reply papers: From August 18, 2025, to September 1, 2025

Plaintiff consents to this extension request. This is the third request to extend this deadline, and no other deadlines will be affected should the Court grant this extension request.


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Thank you for Your Honor's time and consideration.

Respectfully Submitted,
CLIFTON BUDD & DeMARIA, LLP
Attorneys for Defendants

By: 

Ian-Paul A. Poulos

Application granted. The Court adopts
the briefing schedule proposed above,
and wishes counsel a speedy recovery.

SO ORDERED.



Hon. Ronnie Abrams

June 25, 2025